



October 10, 2007

Mr. Michael DeVos
Executive Director
Michigan State Housing Development Authority
P.O. Box 30044
Lansing, MI 48909

RE: Draft 2008 QAP

Dear Mr. DeVos:

Fifth Third Community Development Corporation is proud to invest our capital into affordable housing developments across the state of Michigan. We have committed substantial investment both direct and indirectly through syndicators into Low Income Housing Tax Credit properties over the past 10 years. We have a vested interest in the future of the Michigan tax credit program and the ongoing viability of affordable housing projects.

As a significant investor in Michigan, Fifth Third CDC has substantial concerns related to the draft QAP for 2008. The underwriting of each deal to ensure financial success throughout the compliance period is of the up most importance to us. It is important to remember the properties on going financial stability will provide protection for the tenants and assists in the stabilization of the surrounding economy. A QAP should foster continued investment from investors while avoiding unnecessary risks that jeopardize the Michigan affordable housing market.

Fifth Third is regulated and reviewed by the Federal Reserve Bank which includes not only the evaluation of compliance under the Community Reinvestment Act, but also the review of the investments for safety and soundness requirements. The CDC must deploy capital in a safe and sound manner and the investments are reviewed to ensure they meet credit-underwriting guidelines. The 2008 Michigan QAP encourages the development of under funded affordable housing and invites large-scale failure of properties across the state.

I appreciate your time and consideration concerning this important matter. If you would like to discuss further please do not hesitate to contact me at 614-734-0507.

Respectfully,

A handwritten signature in cursive script that reads 'R. Wayne Koehler'.

R. Wayne Koehler
President
Fifth Third Community Development Corporation